


GIBSON DUNN

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: June 29, 2020

June 26, 2020

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VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil Isaza Tuzman. *First*, Mr. Isaza Tuzman would like to convey his gratitude to the Court for allowing him to be with his family for the Jewish holidays in September–October 2019, the last time he sought permission to travel. *Second*, he respectfully requests leave to travel from July 3 to 7, 2020, in order to attend the wedding of his sister Intiya Isaza-Figueroa, with events in the Districts of Massachusetts and New Hampshire. In light of COVID-19-related uncertainties, these wedding plans were in flux and only finally confirmed today.

Specifically, the wedding ceremony is scheduled for Friday, July 3, 2020, at 55 Warren Street in Boston, MA, at 11:30 am, followed by a family reception at 1280 Union Street in Manchester, NH. On Saturday, July 4, a broader wedding reception will be held at Intiya's home at 85 Elm Street, Charlestown, MA. On Sunday, July 5 or Monday, July 6, there will be a family brunch at a location in Western Massachusetts to be determined.

If this leave request is granted, Mr. Isaza Tuzman would lodge at his sister Intiya's home on the evenings of July 3 and July 4, and with other family members on the nights of July 5 and 6. All other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services and advise Pretrial Services of the specific address where he will be located from July 3 to 7.

This request has been communicated to Pretrial Services, which confirmed that: "As per our office policy, our office objects to out-of-district multi-day travel requests. This objection is general and not specific to Mr. Isaza Tuzman, who has remained compliant with supervision at all times and has traveled without incident on many occasions in the past. If this is approved, I will enter it into the schedule."

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Mr. Isaza Tuzman has previously traveled to Massachusetts and other locations for religious and family events, with the Court's permission. *See* ECF Nos. 125, 441, 758, 952 1033. In these cases and every other time Mr. Isaza Tuzman has traveled outside this District as permitted by the Court, he has left and returned without incident.

As with Mr. Isaza Tuzman's other requests for travel that the Court has granted, the government objects to this leave request.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)